SAYLES WERBNER

April 12, 2011

VIA ELECTRONIC FILING

Honorable Marilyn D. Go United States Magistrate Judge United States District Court 225 Cadman Plaza East, Room 1214S Brooklyn, New York 11201

Re: Weiss, et al. v. National Westminster Bank, Plc, 05-CV-4622 (DLI)(MDG)
Applebaum, et al. v. National Westminster Bank, Plc, 07-CV-916 (DLI)(MDG)

Dear Magistrate Judge Go:

On behalf of all parties, I write to update the Court on the status of our completion of discovery in the above-referenced matters, and to request a brief three-week adjournment of expert depositions. In accordance with the current scheduling order, the parties met the December 30, 2010 and March 4, 2011 deadlines for the service of case-in-chief and rebuttal expert reports. Initial written discovery as to those 19 experts has occurred, and the parties have put in place a joint schedule for depositions of 14 of the experts, while agreeing that depositions need not take place for five, each of whom was an expert in the *Credit Lyonnais* actions.

Due to the Passover holiday and four U.K. bank holidays occurring over the next month, as well as logistical issues pertaining to bringing all non-U.S. experts to New York for their depositions, the parties jointly are requesting that the current May 27 deadline for the completion of expert depositions be extended to June 17, with the deadline for completion of all discovery consequently adjusted from June 20 to July 11. All expert depositions have been scheduled, and the parties expect that each will occur prior to the requested deadline. Finally, the deadlines for contention interrogatories and requests for admissions related to authentication and admissibility of documents are being adjusted in correlation with the completion of depositions.

The proposed Revised Scheduling Order attached to this letter adjusts the above dates accordingly. We thank you for your consideration.

Respectfully submitted,

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cc: All Counsel of Record